

1 **UNITED STATES BANKRUPTCY COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**

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16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **-and-**

20 **PACIFIC GAS AND ELECTRIC
21 COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the lead case,
27 No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Admin.)

**JOINT STATEMENT OF THE DEBTORS
AND THE AD HOC GROUP OF
SUBROGATION CLAIM HOLDERS
REGARDING THE COURT'S DOCKET
TEXT ORDER ON DECEMBER 9, 2019**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),
2 as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11
3 cases (the “**Chapter 11 Cases**”), and the Ad Hoc Group of Subrogation Claim Holders (the “**Ad**
4 **Hoc Subrogation Group**”), as parties to that certain Amended and Restated Restructuring Support
5 Agreement (the “**Subrogation RSA**”), by and through their undersigned counsel, make the
6 following joint statement regarding the Court’s docket text order issued on December 9, 2019:

7 **JOINT STATEMENT**

8 The Debtors and the Ad Hoc Subrogation Group request that the Court defer issuing a ruling
9 on the motion to approve the Subrogation RSA (the “**Subrogation RSA Motion**”) until after
10 December 13, 2019. Accordingly, the Debtors and Ad Hoc Subrogation Group have agreed to
11 modify the outside date for approval of the Subrogation RSA to 12:00 p.m. Pacific Time on
12 Monday, December 16, 2019.¹ The Debtors and the Ad Hoc Subrogation Group will update the
13 Court before Monday if the outside date has been extended further or if the parties wish the Court to
14 rule on the Subrogation RSA Motion.

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16 *[remainder of page left intentionally blank]*
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¹ A notice advising all parties of that extension shall be filed with the Court separately.
28

1 Dated: December 10, 2019

7 /s/ Stephen Karotkin

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